

IN THE UNITED STATES DISTRICT COURT FOR THE
FOR THE DISTRICT OF DELAWARE

ROCEP LUSOL HOLDINGS LIMITED)

Plaintiff and Counterclaim defendant,)

v.)

PERMATEX, INC. and)
ULTRAMOTIVE CORPORATION)

Defendant)

Civil Action No. –CV-05-141(KAJ)

**DECLARATION OF STEPHEN CHIN IN SUPPORT OF
DEFENDANTS' PROPOSED CLAIM CONSTRUCTION
AND
MOTIONS FOR SUMMARY JUDGMENT**

I, Stephen Chin, hereby declare as follows:

1. I am a Partner of Reed Smith, LLP, counsel for Defendants Permatex, Inc. and Ultramotive Corporation, and I make this Declaration in support of Defendants' Proposed Construction of Disputed Claim Terms, Defendants' Motion for Summary Judgment of Non-infringement and Defendants' Motion for Summary Judgment of Invalidity.
2. Attached hereto as Exhibit 1 is a true and correct copy of U.S. Patent No. 6,685,064.
3. Attached hereto as Exhibit 2 is a true and correct copy of PCT Publication No. WO 99/18010.
4. Attached hereto as Exhibit 3 is a true and correct copy of Primos Inc. v. Hunter's Specialties, 2005 U.S. App. LEXIS 14525, decided June 14, 2006.
5. Attached hereto as Exhibit 4 is a true and correct copy of the Preliminary Amendment dated October 9, 2002, bearing Bates Nos. RL-0788 through RL-0092, that was filed with the U.S. Patent and Trademark Office during the prosecution of U.S. Patent Application Serial No. 10/169,290, the application that ultimately issued as U.S. Patent No. 6,685,064, the patent in suit.
6. Attached hereto as Exhibit 5 are true and correct copies of pages 751, 2046 and 2047 of Webster's Third New International Dictionary, containing definitions of the words "engage" and "seal."
7. Attached hereto as Exhibit 6 is a true and correct copy of the Joint Claim Construction Chart submitted to the Court by the parties on May 26, 2006.

This declaration is filed pursuant to 28 U.S.C. § 1746(2). I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 28, 2006 at New York, NY.



Stephen M. Chin